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Summary of Benefits and Coverage and the Uniform Glossary

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Summary of Benefits and Coverage and Uniform Glossary

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Submitter Information

General Comment

The proposed requirement "The SBC must be provided as part of any written application materials that are distributed by the plan or issuer for enrollment" could be interpreted as requiring that an SBC be enclosed with each COBRA Election Notice. The Final Rule should clarify whether (or under what circumstances) it is necessary to enclose one or more SBCs with each COBRA Election Notice. For example, if Qualified Beneficiaries are offered a choice between the full medical+dental+vision coverage they lost and a "core only" package (without dental and vision), would it be necessary to provide an SBC for each benefit package being offered, or just for the "core only" package, or neither? COBRA Election packages tend to be large and complex already, so adding more material would likely make them more difficult to understand.